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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company To Revise Its Electric Marginal Costs, Revenue Allocation, and Rate Design. (U 39 M)	Application 06-03-005 (Filed March 2, 2006)

SAN DIEGO GAS & ELECTRIC COMPANY'S (U 902 E) REPLY TO THE COMMENTS ON THE RATE DESIGN ISSUES DESCRIBED IN THE AUGUST 22, 2007 SUPPLEMENTAL SCOPING MEMO AND ASSIGNED COMMISSIONER'S RULING UPDATING ISSUES LIST, SCHEDULE, AND CATEGORIZATION

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October 19, 2007

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Pursuant to Commissioner Chong's August 22, 2007 *Supplemental Scoping Memo and Assigned Commissioner's Ruling updating Issues List, Schedule and Categorization* (Scoping Memo), San Diego Gas and Electric Company (SDG&E) submits the following reply to the October 5, 2007 comments on the Rate Design section of the issues presented in Attachment A of the Scoping Memo.

I. OBJECTIVES OF DYNAMIC PRICING AND TIME DIFFERENTIATED RATES

In SDG&E's comments filed October 5, 2007 (SDG&E Comments)[1], SDG&E recommended that dynamic pricing and time differentiated rates (TDR) should provide price transparency to promote economic efficiency and equity. (SDG&E Comments at p.4) To achieve this outcome, SDG&E recommended that "hidden" subsidies be removed and societal goals and objectives be decoupled from rates in order to allow all customers to receive appropriate price signals. (SDG&E Comments at p.4). The California Large Energy Consumers Association (CLECA) reinforces this view by stating

[1] Throughout the remainder of this document, references to a party name followed by "Comments" should be construed as citation to that party's comments filed October 5, 2007.

"the single biggest enemy of efficient electric ratemaking in California is the fact that existing rates are riddled with subsidies and compromise…" (CLECA Comments at p.3).

While SDG&E does not dispute that providing relief for certain customers through programs such as CARE is an important priority, the discounts embedded in rates for programs such as CARE mask the true price signal and level of relief provided to these customers. As Southern California Edison (SCE) points out, the CARE program comprises nearly 25% of all residential customers state-wide. (SCE Comments at p.24). Such a large percentage of overall customers should not be removed from participation in dynamic pricing. Furthermore, while the value of an avoided kWh or kW is the same whether a customer is CARE or non-CARE, the benefit is inequitable between these customer classes because the CARE rates are discounted by at least 20%. (SCE Comments at p.24) Removing embedded discounts from the rates would mitigate this inequity. In lieu of removing discounts, the Commission would need to consider a policy that would account for the discounts by providing reduced credits to CARE customers for demand response benefits. (SCE Comments at p.24).

II. RATE OPTIONS

In supporting the dynamic pricing goal of providing price transparency, SDG&E recognized that the value of the price signal provided would depend on the customer's ability to understand the rate structure, receive the price signal and act on this information. Thus, SDG&E recommended that the Commission ensure that the utilities have flexibility in providing customers a wide range of rate options. (SDG&E Comments at p.5) Many of the commenting parties offer specific rate design options and/or applicability standards that they believe should be considered with respect to dynamic pricing. These proposals include for example:

- California Rice Millers (CRM) – Time-of-use (TOU) rate variations for agricultural customers (CRM Comments at pp.3-5);
- Western Power Trading Forum (WTPF) – Critical peak pricing (CPP) exemptions for any net power consumed by a licensed generating facility (WTPF Comments at p.9);
- ICE Energy, Inc. – Consideration of the relationship of proposed dynamic pricing options and peak load shifting (PLS) (ICE Comments at p.5);

- The Utility Reform Network (TURN) – recommends limited options for residential and small commercial customers, current rate, TOU rate and CPP rate (TURN Comments at p.7);
- California Manufactures and Technology Association (CMTA) – Existing TOU rates be left intact for customers with demands greater than 500 kW (CMTA Comments at p.6); and
- Pacific Gas and Electric (PG&E) – Dynamic rate options and demand response programs should focus primarily on the largest commercial and industrial customers with significant process loads and residential air conditioning (PG&E Comments at p.5).

Consistent with Ordering Paragraph 4 of the Supplemental Scoping Memo and Assigned Commissioner's Ruling Updating Issues List, Schedule and Categorization (ACR), which established this phase as quasi-legislative, SDG&E recommended that the Commission initially focus on the development of policy objectives. (SDG&E Comments at p.3). Specific rate design issues proposed by the commenting parties should be addressed within the context of each utility's ongoing rate design proceedings where the operational and customer characteristics associated with each utility can be taken into consideration. In addition, as PG&E states, "by adopting clearly stated goals and narrowly defined policy goals for this proceeding, the Commission should be able to somewhat reduce the burden of coordinating its actions here with those set forth in other proceedings." (PG&E Comments at p.2). This is particularly pertinent given the Commission's recent ruling revising phase 2 activities in R.07-01-011, where the Commission is seeking comments on the Energy Division's proposed goals and milestones for demand response goal attainment.[2] In the development of demand response goals, the Energy Division recognizes that "there is a need to create retail tariffs/programs for all customers, including residential and small commercial, which incorporate proper market signals, aligned with wholesale market prices."[3]

Nearly all commenting parties recommend that a variety of rate options be offered to each customer class. Consistent with SDG&E's contention that the utilities must be

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[2] Assigned Commissioner's and Administrative Law Judge's Ruling Revising Phase 2 Activities and Schedule, p.1.
[3] Ibid, p. A-10.

afforded flexibility, SDG&E concurs with PG&E's endorsement of the development of dynamic rates while preserving customer choice, (PG&E Comments at p.3) and notes that both CMTA and CRM are advocating a variety of rates to be made available to their constituents. (CMTA Comments at p.8; CRM Comments at p.1). But consensus also exists on a point of caution regarding offering a menu of rate options – SDG&E agrees with CLECA that too many options can result in adverse selection (CLECA Comments at p.9), and also with DRA and TURN, who contend that less sophisticated customers in the mass market should not be overwhelmed with too many rate options, especially when the rate options offered are new to the class. (DRA Comments at p.7; TURN Comments at p.7). PG&E also makes a good point that a narrower portfolio of rates for residential and small commercial customers would simplify marketing and customer education efforts, and reduce administrative costs. (PG&E Comments at p.4). On the other hand, the Building Owners and Managers Association (BOMA) recommends only one rate option for all customers based on marginal cost based real time prices (MCRTP). (BOMA Comments at p.3). In an effort to ensure economic efficiency, BOMA proposes to precisely align dynamic rates with the marginal costs of service.[4] (BOMA Comments at p.3). To ensure equity, all customers would face the same price signals adjusted only for losses. (BOMA Comments at p.7). SDG&E believes that offering a real-time-pricing (RTP) tariff linked to market prices should represent only one option potentially offered to customers.[5] As SDG&E previously noted, a "one-size fits all" approach is neither reasonable nor optimal. (SDG&E Comments at p.6)

In offering an RTP rate, SDG&E agrees with PG&E and DRA that important questions about how to best incorporate MRTU price information remain unresolved, and that time will be needed in order to understand the MRTU price information and how to best incorporate it for future ratemaking purposes. (PG&E Comments at p.11; DRA Comments at p.6).

[4] Prior to the implementation of the Market Redesign and Technology Update (MRTU), prices would be aligned with the marginal costs estimated based on the utility's dispatch cost calculations.
[5] Where "flatter" rate options are offered as alternatives to RTP rates, the correct level of the hedging premium should be reflected.

III. COMPONENTS OF DYNAMIC PRICING TARIFFS

In addition to rate design options, several parties recommended that elements of marginal cost also be reviewed in the development of dynamic pricing. DRA recommends an analysis of the combustion turbine (CT) proxy method for the establishment of marginal generation costs, and an analysis of how distribution costs vary with time. (DRA Comments at p.2) CLECA also recommends further study of the time-variant nature of distribution capacity costs. (CLECA Comments at p.15). BOMA recommends establishing methodologies for estimating marginal costs for all components, both dynamic and static. (BOMA Comments at p.5). Again, SDG&E believes these types of rate design issues should be addressed in a ratesetting proceeding, where the utility's operational and system characteristics can be appropriately reviewed and analyzed.

BOMA also argues that distribution costs could be collected through a combination of fixed charges and peak coincident charges but that non-coincident charges shouldn't be used as they distort price signals. (BOMA Comments at p.12). SDG&E disagrees with BOMA's assertions. To the extent that distribution investments are made that are not dependent on time-of-use criteria, then these costs should be recovered from a non-time variant charge. As SCE points out, rate differentials should be based on the cost principles specific to the service – "[f]or example, a customer who intermittently places a high demand on its distribution circuit should pay the cost of distribution infrastructure necessary to serve its demand, captured by the customer's non-time related demand charge." (SCE Comments at p.4). Therefore, recovering non-time related costs through time-differentiated charges creates potential subsidies within the rates as customers avoid costs that must then be recovered from all other customers. BOMA's recommendation is a violation of fundamental cost causation principles.

IV. RECOVERING THE REVENUE REQUIREMENT

In discussing recovery of revenue requirements, CLECA recommends that any over or under collections should be maintained within the class and schedule. CLECA states that "[i]f the cost of service for customers on one schedule is lower they should receive a lower relative cost allocation … This will result in a lower average rate for the schedule, compared to other schedules." (CLECA Comments at p.21). SDG&E

specifically addressed this issue, stating that this is problematic because it results in customer migration issues. SDG&E states that "[i]f separate revenue requirements are established for rate options within a particular class of customers the utility will face customer migration issues. To the extent that customers are able to migrate to multiple tariffs and the revenue requirements associated with each tariff are different, customers will likely switch rates when it is advantageous based on whether an available rate option is either higher or lower than the customer's current rate." (SDG&E Comments at p.7). SDG&E also agrees with TURN that to the extent customers are able to move from one tariff to another, they change the composition of the customer group. As a result, the movement can create unintended "perverse effects." (TURN Comments at p.21).

V. RESIDENTIAL RATE ISSUES

In discussing the components of dynamic pricing tariffs, SDG&E recommended that to the extent costs were incurred based on fixed investments, these costs should be recovered through fixed charges. (SDG&E Comments at p.6). Both TURN and DRA, however, recommended that some fixed costs should be recovered through volumetric rates. (TURN Comments at pp.5-6; DRA Comments at pp.11-12). DRA further states that inclusion of fixed costs can be justified since externalities aren't included in marginal costs. (DRA Comments at pp.11-12). Thus, departures from marginal cost pricing to reflect externalities are reasonable since these changes override individual preferences for the common good. That is, volumetric charges coupled with the current tiered rate design will promote greater energy efficiency, demand response and greenhouse gas (GHG) reductions. (TURN Comments at pp.16, 18 & 27; DRA Comments at p.5). As DRA states, "[p]romoting energy efficiency and greenhouse gas emissions reductions, which the steeply inverted residential default rate does, is as important if not more important than demand response." (DRA Comments at p.5).

As SDG&E discussed in its opening comments, while the current tiered residential rates provide incentives to larger-use customers to reduce usage, the conservation signal provided does not reflect any element of time. That is, the current tiered rates send the message that customers should just use less, not that customers should use less during the utility's on-peak periods. In addition, those customers using less than 130 percent of baseline (AB1X protected usage) receive no price signal to encourage conservation as these rates are capped. Thus, contrary to DRA's claim, the current tiered residential rates are not an appropriate proxy for a TOU rate. (DRA Comments at p.24). While some element of correlation between the upper tiers and summer usage[6] exists, the current rates charge residential customers the exact same price regardless of whether the usage is on-peak or off-peak. Thus, designing dynamic rates based on "cost causation" and marginal costs principles will provide price transparency consistent with the goals of encouraging economic efficiency and equity as well as provide customers the appropriate price signals to encourage investments in ways that will help these customers manage their energy usage. While TOU and CPP rates can be offered, current AB1X restrictions only allow these rates on a voluntary basis. But, as SCE points out, only those customers who are paying rates that greatly exceed the cost-to-serve would opt for these dynamic rates. (SCE Comments at p.23).

Both CLECA and BOMA recommend against the use of residential rebates. As CLECA argues, rebates are problematic in that they are not associated with a price signal. (CLECA Comments at p.7). In addition, CLECA argues that rebates require the use of customer baselines (CBL) which have proven problematic due to the potential for significant free ridership. (CLECA Comments at p.8). BOMA argues that critical peak rebates should not be offered because they distort marginal cost based rates, compromise efficiency and shift costs. (BOMA Comments at p.7) While SDG&E has never favored the use of peak time rebates (PTR) as a substitute for dynamic pricing, SDG&E agrees with DRA that PTR serve as a transition to dynamic price rates. (DRA Comments at p.8). In the short term, DRA prefers programs that offer positive incentives for reductions in peak consumption, with dynamic rates eventually becoming the default. (DRA Comments at p.8). SDG&E also agrees with SCE that PTR provides the best opportunity to achieve significant demand response from residential customers given the restrictions imposed by AB1X. (SCE Comments at p.10).

VI. CRITICAL PEAK PRICING

CLECA and BOMA are also critical of CPP rate designs. Because CLECA's dynamic pricing goal is an RTP tariff, CLECA recommends that SDG&E's default CPP

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[6] 46% of the summer consumption of PG&E's customers who consume in the upper tiers is during the on-peak period. (DRA Comments at p.24)

be treated as an experiment. (CLECA Comments at p.7). The key issue for CPP is whether rolling fixed costs into high volumetric rates will provide demand response that allows for the avoidance of future fixed costs. (CLECA Comments at p.6). BOMA believes that CPP is a "poorly conceived rate design" that shouldn't be seriously considered by the Commission as it is not likely to result in long term load changes thus perpetuating a "peaky system load shape". (BOMA Comments at p.20). As SDG&E stated in its original comments, developing CPP rates that reflect the utilities marginal costs should be able to provide sufficient price differentials between CPP and non-CPP periods to encourage customer demand response. (SDG&E Comments at p.11). However, as DRA points out, "CPP rates will evoke an even greater response, especially if the actual wholesale capacity price is higher than the CT price." (DRA Comments at p.19). SDG&E agrees with PG&E that CPP rates can strike a reasonable balance between communicating to customers when CPP prices would be called, and providing demand response during periods where peak load and thus generation shortfalls are likely to occur. (PG&E Comments at p.25). Coupling CPP rates with other rate elements such as a capacity reservation charge should provide customers a viable rate option that allows customers to have greater control over their energy usage while providing benefits to the utility.

In addition, SDG&E contends that the CPP period should be determined based on each utility's system and customer characteristics. The length of the period must be such that the peak is not merely shifted to another time of day, otherwise no demand response benefits will emerge. (SDG&E Comments at p.11). Both TURN and CLECA identified alternative proposals with respect to establishing the length of the CPP period. SDG&E again emphasizes that certain issues, such as the length of a CPP period, are more appropriately resolved in each utility's individual rate design proceedings.

VII. TIMING OF TARIFF DEVELOPMENT AND ROLL-OUT

SDG&E again recommends the utilization of one year of bill protection to ease customer resistance to dynamic pricing. (SDG&E Comments at p.5) Nearly every party agrees that giving customers who lack experience with dynamic rates the ability to "test drive" new rate options will be critical to the acceptance and eventual success of those rates. (TURN Comments at p.15; CMTA Comments at p.7; DRA Comments at p.8).

Certainly bill protection would be necessary if dynamic rates are ultimately mandated (SCE Comments at p.8; CLECA Comments at p.13), and will be effective at encouraging customers to try a new rate option offered on either an opt-in or opt-out basis. (PG&E Comments at p.6). On the other hand, BOMA's categorization of bill protection as merely another subsidy that ought to be avoided (BOMA Comments at p.9) is overly simplistic and short sighted. Moving California's utility customers onto time-differentiated rates will be a process, not an instantaneous event, and will require customer acceptance that can only be earned through education and experience with the new rates. Overcoming initial customer resistance to new rate options, and thus insuring the long term success of those new rate options, will require tools like bill protection to encourage customers to identify ways to take full advantage of the proposed rate options.

VIII. CONCLUSION

As discussed herein, SDG&E respectfully requests that the Commission consider SDG&E's reply when formulating dynamic pricing policy.

Respectfully Submitted,

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October 19, 2007

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **SAN DIEGO GAS & ELECTRIC COMPANY'S (U 902 E) REPLY TO THE COMMENTS ON THE RATE DESIGN ISSUES DESCRIBED IN THE AUGUST 22, 2007 SUPPLEMENTAL SCOPING MEMO AND ASSIGNED COMMISSIONER'S RULING UPDATING ISSUES LIST, SCHEDULE, AND CATEGORIZATION** on each party named in the official service list for proceeding A.06-03-005 by electronic service, and by U.S. Mail to those parties who have not provided an electronic address.

Copies were also sent via Federal Express to Commissioner Rachelle B. Chong and assigned Administrative Law Judge David K. Fukutome.

Executed this 19th day of October 2007 at San Diego, California.

/s/ Susan A. Long ________________

Susan A. Long

CALIFORNIA PUBLIC UTILITIES COMMISSION
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